

**IN UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE

CHINA VALVES TECHNOLOGY SECURITIES
LITIGATION

This paper applies to: ALL CASES

Master Docket No.
11 Civ. 0796 (LAK)

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION FOR
(I) PRELIMINARY APPROVAL OF PROPOSED SETTLEMENT,
(II) CERTIFICATION OF THE CLASS FOR PURPOSES OF THE SETTLEMENT
AND (III) APPROVAL OF NOTICE TO THE CLASS**

PLEASE TAKE NOTICE that upon the accompanying Declaration of William B. Federman, dated April 29, 2014, the exhibit attached thereto, the accompanying Memorandum of Law and all prior pleadings and proceedings had herein, Lead Plaintiff Bristol Investment Fund, Ltd. and Plaintiff Joseph Gibbons ("Plaintiffs") hereby move this Court, at the United States District Court for the Southern District of New York, before the Honorable Lewis A. Kaplan, located at 500 Pearl Street, New York, New York 10007, for an Order: (1) granting preliminary approval of the proposed Settlement; (2) conditionally certifying a class for purposes of settlement (the "Class"); (3) appointing Lead Counsel as Lead Class Counsel; (4) approving the parties' proposed form and method of giving notice of the pendency of this action and the Settlement to the Class; (5) directing that notice be given to the Class members; and (6) scheduling a hearing¹ at which time the Court will consider (a) the parties' request for final approval of the Class, the Settlement, the Plan of Allocation, and entry of the Final Judgment and Order of Dismissal With

¹ In keeping with the Class Action Fairness Act, 28 U.S.C. § 1715, Plaintiffs request that the Settlement Hearing be held no earlier than August 7, 2014, which is 100 calendar days after the filing of the Stipulation and Agreement of Settlement.

Prejudice, and (b) Lead Class Counsel's application for an award of attorneys' fees and reimbursement of expenses, including reimbursement awards to Plaintiffs; and (7) granting such other relief as the Court deems just and proper.

Defendants do not oppose this motion.

Dated: April 29, 2014

Respectfully submitted,

s/William B. Federman
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Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on April 29, 2014.

/s/William B. Federman
William B. Federman